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October 9, 2026

Office of Energy Infrastructure Safety
California Natural Resources Agency
Sacramento, CA 95184
efiling@energysafety.ca.gov

Subject: The Utility Reform Network (TURN) Request for Data Request Stakeholder Designation

Docket: EPU-PGE

Dear Office of Energy Infrastructure Safety,

The Utility Reform Network (TURN) requests Data Request Stakeholder Designation for the Electrical Undergrounding Plan (EUP) for Pacific Gas & Electric docket (#EUP-PGE), for data requests for Pacific Gas & Electric.[1]

TURN is a non-profit consumer advocacy organization with a long history of representing the interests of residential and small commercial customers of California's utility companies before the CPUC and, more recently, the Office of Energy Infrastructure Safety (Energy Safety). TURN has filed comments on various utility WMPs in recent years, including most recently on PG&E's 2026-2028 Plan. The EUPs are a novel proceeding but not completely unrelated. In its advocacy before Energy Safety and the CPUC, TURN seeks to ensure that utility wildfire mitigations are targeted to where they are most needed and consistent with a cost-effective use of ratepayer funds. Data requests are an important means by which TURN will analyze the EUP and support its comments.

Accordingly, please designate TURN and its representatives as a Data Request Stakeholder in this docket, as follows:

The Utility Reform Network
360 Grand Avenue, #150
Oakland, CA 94610
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Elise Torres, Assistant Managing Attorney, Energy Team
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Sincerely,

/s/ ***A Mireille Fall***

A Mireille Fall
Staff Attorney

[1] Office of Energy Infrastructire Safety, 10-Year Electrical Undergrounding Plan Guidelines, February 20, 2025, Section 3.7.2.1.